

Exhibit 2

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

X Chapter 11

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI

Case No. 22-12055

Debtor.

-----X

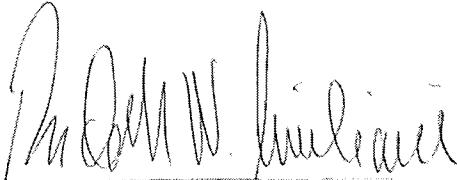
APPLICATION TO CONVERT CHAPTER 11 TO CHAPTER 7

TO: THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

Rudolph W. Giuliani, the Debtor and Debtor-in-Possession herein (the "Debtor"), by and through his attorneys, Berger, Fischoff, Shumer, Wexler & Goodman, LLP, as and for his application to convert his Chapter 11 bankruptcy to a Chapter 7 bankruptcy, represents as follows:

- 1. A voluntary Chapter 11 petition was filed on December 21, 2023, a Trustee has not been appointed and the case is still pending and has not been confirmed, discharged or dismissed.
- 2. The Debtor wishes to convert the instant Chapter 11 case to a proceeding under Chapter 7 pursuant to Section 1112(a) of the Bankruptcy Code.

WHEREFORE, it is respectfully requested that this Chapter 11 case be converted to a proceeding under Chapter 7.


Rudolph W. Giuliani